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Attorneys for Defendants Temujin Labs Inc.
(Delaware) and Temujin Labs Inc. (Cayman)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ARIEL ABITTAN,

Plaintiff,

v.

LILY CHAO (A/K/A TIFFANY CHEN, A/K/A
YUTING CHEN), DAMIEN DING (A/K/A
DAMIEN LEUNG, A/K/A TAO DING),
TEMUJIN LABS INC. (A DELAWARE
CORPORATION), AND TEMUJIN LABS INC.
(A CAYMAN CORPORATION,

Defendants,

and
EIAN LABS INC.,

Nominal Defendant.

Case No.: 5:20-cv-09340-NC

**STIPULATION EXTENDING TIME
TO RESPOND TO COMPLAINT**

(CIVIL L.R. 6-1(a))

Judge: Hon. Nathanael Cousins

Date Action Filed: December 24, 2020

Pursuant to Civil Local Rules 6-1 and 7-12, plaintiff Ariel Abittan (“Plaintiff”) and defendants Temujin Labs Inc. (Delaware) (“Temujin Delaware”) and Temujin Labs Inc. (Cayman) (“Temujin Cayman,” and together with Temujin Delaware, the “Stipulating Defendants”), by and through their respective counsel, stipulate as follows:

WHEREAS, Plaintiff commenced this action on December 24, 2020;

WHEREAS, Plaintiff purports to have served the complaint in this action on the Stipulating Defendants on January 29, 2021 whereby the Stipulating Defendants’ deadline to respond to the complaint would have been February 19, 2021;

WHEREAS, Plaintiff and Stipulating Defendants previously agreed, pursuant to Civil L.R. 6-1(a), to extend the Stipulating Defendants’ deadline to respond to the complaint to March 5, 2021;

WHEREAS, Plaintiff and Stipulating Defendants currently are discussing a separate stipulation and proposed order that would include a voluntary dismissal of this action in favor of Plaintiff re-filing Plaintiff’s claims in the California Superior Court for the County of Santa Clara, Case No. 20-CV-372622, with Defendants reserving their right to challenge the legal or factual adequacy of said claims;

WHEREAS, absent voluntary dismissal of these claims, the Stipulating Defendants anticipate filing motion(s) to dismiss in response to the complaint;

WHEREAS, Plaintiff and the Stipulating Defendants have met and conferred and have agreed to a schedule for the Stipulating Defendants to respond to the complaint, whereby any response(s) are due March 26, 2021;

IT IS ACCORDINGLY STIPULATED, pursuant to Civil L.R. 6-1(a), by and between Plaintiff and the Stipulating Defendants, that the time for Temujin Delaware and Temujin Cayman to answer, move, or otherwise respond to the complaint is extended to March 26, 2021.

[signatures follow on next page]

1 Dated: March 3, 2021

ALTO LITIGATION, PC

2 By: /s/ Bahram Seyedin-Noor
Bahram Seyedin-Noor

3 4 Embarcadero Center, Suite 1400
4 San Francisco, California, 94111
5 Telephone: (415) 779-2586
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6 Attorneys for Plaintiff Ariel Abittan

7 Dated: March 3, 2021

FENWICK & WEST LLP

8 By: /s/ Jennifer Bretan
Jennifer Bretan

9 Attorneys for Defendants Temujin Labs Inc.
(Delaware) and Temujin Labs Inc. (Cayman)

10
11 Pursuant to Civil L.R. 5-1(i)(3), all signatories concur in filing this stipulation.

12 Dated: March 3, 2021

By: /s/ Jennifer Bretan
Jennifer Bretan

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